

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

04 CR 10068 RWZ

UNITED STATES OF AMERICA)	CRIMINAL NO. -
)	
v.)	VIOLATIONS:
)	
1. VICTOR SOSA,)	- 21 U.S.C. § 846 -
a/k/a "Victorino,")	Conspiracy to Distribute,
2. ALEX ARANGO-PEREZ,)	And to Possess with Intent
a/k/a)	To Distribute, Cocaine
"Ariel Lugo-Torres,")	
3. DIEGO ORTIZ,)	- 21 U.S.C. § 841
)	Possession with
Defendants.)	Intent To Distribute, and
)	Distribution of, Cocaine
)	
)	- 21 U.S.C. § 841
)	Possession with
)	Intent to Distribute, and
)	Distribution of, Heroin
)	
)	- 18 U.S.C. § 2
)	Aiding and Abetting
)	
)	- 21 U.S.C. § 853
)	Criminal Forfeiture

INDICTMENT

COUNT ONE: (21 U.S.C. § 846 - Conspiracy to Distribute,
and to Possess with Intent to Distribute,
Cocaine).

The Grand Jury charges that:

Beginning on an unknown date but at least by on or about
February 8, 2004 and continuing to on or about February 13, 2004,
at Chelsea, Everett and elsewhere in the District of
Massachusetts,

1. VICTOR SOSA, a/k/a "Victorino,"
2. ALEX ARANGO-PEREZ, a/k/a "Ariel Lugo-Torres,"
3. DIEGO ORTIZ,

defendants herein, did knowingly and intentionally combine, conspire, confederate, and agree with each other, and with other persons unknown to the Grand Jury, to distribute, and to possess with intent to distribute, cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

The conspiracy charged herein involved five kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(A)(ii).

COUNT TWO: (21 U.S.C. § 841(a)(1) - Possession with Intent to Distribute, and Distribution of, Cocaine;
18 U.S.C. § 2 - Aiding and Abetting).

The Grand Jury further charges that:

On or about February 13, 2004, at Chelsea and Everett in the District of Massachusetts, and elsewhere,

1. VICTOR SOSA, a/k/a "Victorino,"
2. ALEX ARANGO- PEREZ, a/k/a "Ariel Lugo-Torres,"
3. DIEGO ORTIZ,

defendants herein, did knowingly and intentionally distribute, and possess with intent to distribute, cocaine, a Schedule II controlled substance.

The offense charged herein involved five kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(ii) and Title 18, United States Code, Section 2.

COUNT THREE: (21 U.S.C. § 841(a)(1) - Possession with Intent to Distribute, and Distribution of, Heroin;
18 U.S.C. § 2 - Aiding and Abetting).

The Grand Jury further charges that:

On or about January 29, 2004, at Chelsea, in the District of Massachusetts, and elsewhere,

1. VICTOR SOSA, a/k/a "Victorino,"

defendant herein, did knowingly and intentionally distribute, and possess with intent to distribute, heroin, a Schedule I controlled substance.

The offense charged herein involved 100 grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(i) and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION

The Grand Jury further charges that:

1. As a result of the offenses alleged in Counts One, Two and Three of this Indictment,

1. VICTOR SOSA, a/k/a "Victorino,"
2. ALEX ARANGO-PEREZ, a/k/a "Ariel Lugo-Torres,"
3. DIEGO ORTIZ,

defendants herein, shall forfeit to the United States any and all property constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as a result of the offenses, and any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses.

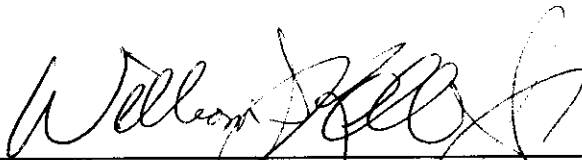
2. If any of the properties described in paragraph 1, above, as a result of any act or omission of the defendants --

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

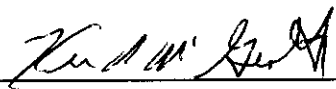
it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in paragraph 1.

All in violation of Title 21, United States Code, Section
853.

A TRUE BILL




Foreperson of the Grand Jury



Assistant United States Attorney

DISTRICT OF MASSACHUSETTS:

Returned into the District Court by the Grand Jurors and filed.



Deputy Clerk

3/11/04 @ 4:05pm